

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Robert G. Boyle and Danielle Laree Boyle aka
Danielle L. Boyle

Debtor(s)

Franklin American Mortgage Company, or its
Successor or Assignee

Plaintiff(s)/Movant(s)

vs.

Robert G. Boyle and Danielle Laree Boyle aka
Danielle L. Boyle
Charles J. DeHart, III

Defendant(s)/Respondent(s)

CHAPTER 13

CASE NO. 1 - 17 -bk- 00702

ADVERSARY NO. - ap-
(if applicable)

Nature of Proceeding:

Motion for Relief from Stay

Document #: 57

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The parties are working towards a resolution of the Motion for Relief from Automatic Stay.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: February 20, 2018

/s/ Alexandra T. Garcia

Attorney for Movant

Name: Alexandra T. Garcia

Phone Number: 215-790-1010

¹ No alterations or interlineations of this document are permitted.